

EXHIBIT 1



SAMSUNG ELECTRONICS AMERICA, INC.

Washington IP Office
700 Pennsylvania Avenue, SE
Suite 600
Washington, DC 20003

Timothy R. Jezek
t.jezek@sea.samsung.com
Principal Legal Counsel
Samsung Electronics America

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Via Electronic Mail

Bukola Landis-Aina
bukola.landis-aina@verizon.com
Associate General Counsel, IP Litigation
Verizon
1300 I St NW, Suite 500 East
Washington DC 20005

Re: Licensing Offers from Intellectual Discovery


Dear Ms. Landis-Aina,

I have raised with Samsung Electronic America's ("SEA"'s) parent, Samsung Electronics Corporation ("SEC") whether it is willing to voluntarily provide licensing proposals from Intellectual Discovery ("ID") related to US Patent No. 6,922,728 (the "'728 patent").

I have no ability to obtain the proposals myself or compel their production from SEC. However, SEC has informed me as follows, and authorized me to share the following information with you:

- SEC has received multiple proposals in the past from ID related to the '728 patent.
- At the present time, SEC has no objection in principle to providing those proposals to Verizon.
- However, those proposals are covered by contractual confidentiality obligations between SEC and ID.
- ID has agreed that SEC may disclose the fact of the licensing proposals, but has not more broadly waived SEC's confidentiality obligations to allow for those proposals' production to Verizon.
- SEC has specifically requested that ID allow it to provide Verizon the proposals in question, but ID has rejected SEC's request.

With Best Regards,


Timothy R. Jezek